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June 17, 2022

VIA ECF

United States District Court
Eastern District of New York
Attn: The Honorable Diane Gujarati
225 Cadman Plaza East
Brooklyn, NY 11201

Re: JGIAP RH 160 LLC v CRI Holding Corp, et. al., Case No. 1:21 cv 02489 (DG)
(JRC)

Judge Gujarati,

I represent, currently, Plaintiff, in the above-referenced matter (the “Matter”) and I write in response to Your Honor’s request for a status report on the Matter and with regard to my representation of Plaintiff. For reasons explained further below, although there have been unfortunate delays in the proceeding of the Matter, which Plaintiff neither intended nor contrived, Plaintiff certainly intends on vigorously pursuing the remedies outlined in its Complaint. Additionally, although I remain counsel of record, unforeseen familial circumstances will require my withdrawal from the case, pending appropriate counsel to replace the undersigned.

Prior to Plaintiff’s response date in the original briefing schedule, the undersigned parted ways with the law firm at which the Matter was being handled. The undersigned’s intent was to transfer the matter to a new law firm, and defendants agreed to extensions of the briefing schedule in order to allow time for that transition to occur. The undersigned negotiated with defendants, *sua sponte*. In advance of the altered response date, due to significant family issues, the undersigned determined that he could no longer stay on the Matter in light of moving out of the state to live closer to family. The undersigned informed defendants of this development. Indeed, the undersigned has kept defendants’ counsel apprised of the ongoing developments at each step. Plaintiff is currently determining to which law firm it will transition the Matter.

Plaintiff is aware of the June 16, 2022 letter, filed by the Manda defendants. Plaintiff believes that a conference with the Court would be appropriate to address these issues. There have been no dilatory tactics, and any delay has been the result of circumstances out of Plaintiff’s control. There is no necessity for briefing on this issue as Plaintiff has in no way acted in bad faith. To the contrary, Plaintiff is eager to pursue the Matter, prove its claims, and receive the damages to which it is entitled.

In light of early stages of the Matter, and the lack of prejudice that defendants will suffer in order to allow for the orderly transition of the Matter, Plaintiff requests 30 days to obtain new counsel and respond to the Motions to Dismiss.

Thank you Your Honor.

Sincerely,

/s/ Ryan M. Wilson
Ryan M. Wilson